

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

Selene Danielle Arriaga,

Plaintiff,

v.

Thomas J. Dart, Sheriff of Cook County, Illinois; The Northeast Regional Commuter Railroad Corporation d/b/a Metra; Cook County, Illinois; Marie Rangel, Joseph Perez; Paul Riggio; David Cammack; Theodore Stajura; and Timothy O'Donnell,

Defendants.

Case No: 20-cv-4498

The Honorable Judge Virginia Kendall
Magistrate Judge Maria Valdez

**PLAINTIFF'S MOTION FOR LEAVE TO FILE RESPONSE TO SHERIFF
DEFENDANTS' MOTION TO DISMISS INSTANTER (Dkt. 30)**

NOW COMES, SELENE DANIELLE ARRIAGA ("Plaintiff"), by and through undersigned counsel, and moves this Honorable Court for a second extension of time up to and including November 24, 2020 to respond to the Sheriff Defendants' Motion to Dismiss (Dkt. 30) for the following reasons, and/or to file the Response Instanter on November 24, 2020.

1. Plaintiff's counsel contacted all defense counsel by email on November 24, 2020, and will confirm with the Court when he hears back.
2. This is Plaintiff's Second Motion for Extension of Time or Motion for Leave to File Instanter.
3. Plaintiff requires an additional day to respond to the Motion due to a number of other obligations pending, including:
 - a. Motion to Dismiss Response due in *Macklin v. IDOT, et al.*, 2020 CH 04096 that is due on November 20, 2020.

- b. Deposition in *Strickland v. Dart*, 19-cv-02621, on November 16, 2020 at 12:00 p.m.
- c. Deposition in *Leibas, et al. v. Dart, et al.*, 19-cv-07592, on November 16, 2020 at 10:30 a.m. and in the afternoon (undersigned is having cocounsel cover this during the *Strickland* deposition).
- d. Deposition in *Leibas, et al. v. Dart, et al.*, 19-cv-07592, on November 19, 2020 at 10:30 a.m.
- e. Deposition in *Leibas, et al. v. Dart, et al.*, 19-cv-07592, on November 23, 2020 at 10:30 a.m.
- f. The above-noted depositions took a substantial amount of preparation time and also took up most of the prior week and all day on November 23, 2020 until after 6 p.m.

- 5. In addition, the Response contains a number of issues that are research-intensive into equal protection and statutes of limitations, and took a lot of research time to properly respond.
- 6. This Motion is not for dilatory purposes but to ensure a proper and fulsome response to the Motion to Dismiss is filed.

CONCLUSION

Plaintiff respectfully requests leave to file the accompanying Response Instanter on November 24, 2020.

For the foregoing reasons, Plaintiff respectfully requests that this Court grant this Motion and allow her to file her Response to the Sheriff Defendants' Motion to Dismiss (Dkt. 30) Instanter on November 24, 2020.

Respectfully submitted,

/s/ Cass T. Casper

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that he served the foregoing document on all counsel of record via this Court's CM/ECF filing system on November 24, 2020, and that such counsels are registered e-filers.

/s/ Cass T. Casper